

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X 09-CV-1587 (BMC)

KEESHA MITCHELL, THERESA CAMPBELL,
SEANNETTE CAMPBELL, and TANISHA SELBY,

Plaintiff,

-against-

LYONS PROFESSIONAL SERVICES, INC., RICHARD
TRIM and TERRY TATUM,

Defendants.

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**MOTION FOR PAYMENT/DELIVERY OF PROPERTY OF JUDGMENT
DEBTOR AND FOR DETERMINATION OF ADVERSE CLAIMS**

Gary N. Rawlins, an attorney duly admitted to practice law in the United States District Court for the Eastern District of New York, hereby affirms the following under the penalties of perjury:

1. I am the attorney for Plaintiffs KEESHA MITCHELL, THERESA CAMPBELL, SEANNETTE CAMPBELL, and TANISHA SELBY, and as such am fully familiar with the facts of this case. I make this affirmation upon information and belief, the source being the files and records in my office.

2. Pursuant to CPLR §5225(a) and (b), plaintiffs move to (a) have LYONS PROFESSIONAL SERVICES pay the judgment entered by this court and (b) to have CHRISTOPHER LYONS and GARRISON PROTECTIVE SERVICES (“GARRISON”) deliver property obtained from the judgment debtor.

3. Upon information and belief, Christopher Lyons, sole owner of Lyons

Professional Services, has control of all the assets, contracts and money and property of the corporation. Upon information and belief he transferred his/the company's contracts, equipment and employees to GARRISON in an effort to avoid this court's judgment.

4. This writer's belief is based on conversations with GARRISON secretary Melanie on April 8, 2010. During that conversation, Melanie informed me that Garrison purchased Lyons Professional Services on April 1, 2010 and that all Lyons Professional Services employees interest were acquired by GARRISON.

5. Upon further inquiry, I received a telephone call from attorney Brooke Anthony who informed me that the Law Offices of Raymond Gusto is general counsel to Garrison and that to her knowledge Lyons Security has a consulting agreement with Garrison. She went on to say that Garrison did not purchase Lyons Security and that Melanie is ignorant of company matters as they relate to Lyons and Garrison.

6. Melanie confirmed that Richard Trim was employed by Garrison and provided me with Christopher Lyon's cell phone number.

7. Based on the above, plaintiffs' respectfully request that Your Honor order a proceeding pursuant to CPLR §5239 to determine adverse claims, if any, of Christopher Lyons and GARRISON with regard to the property and money obtained from Lyons Professional Services. Pursuant to CPLR §5225, plaintiffs demand that Garrison and Christopher Lyons pay the judgment entered in this court.

Dated: New York, New York
May 10, 2010

Respectfully Submitted,

/s Gary N. Rawlins
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